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Attorneys for Defendant
Walmart, Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA AT ANCHORAGE

VINCENT MORGAN as father and)
guardian, for the use and benefit of)
S MORGAN, a minor,) **NOTICE OF REMOVAL TO**
Plaintiff,) **FEDERAL COURT**
v.)
WALMART, INC.,) Case No. 3:20 _____
Defendant.)

)

TO: The United States District Court
For the District of Alaska

AND TO: Adam Winner
Barber & Associates, LLC
540 E. 5th Ave.
Anchorage, AK 99501

Please accept this as notice that, pursuant to 28 U.S.C. §§ 1331, 1332(a)(1), 1441 and 1446, the above defendant, WALMART, INC. hereby file in the United States District Court for the District of Alaska this Notice of Removal of the following action: *Vincent Morgan, Guardian for S Morgan v. Walmart, Inc.*, filed in the Superior Court for the

State of Alaska, Third Judicial District at Anchorage, Case No. 3AN-20-07296CI. Said defendant has filed a copy of this Notice with the Clerk of the Superior Court for the Third Judicial District at Anchorage, and said action has thereby been removed from the Alaska Superior Court to this United States District Court. (Ex. A)

The grounds for removal are as follows: Complete diversity of citizenship. 28 U.S.C. §§ 1331, 1332(a)(1), 1441 and 1446. Plaintiff is a resident and citizen of the State of Alaska (Ex. B, Complaint at p.1). Defendant, Walmart, Inc. is a Delaware corporation whose principal place of business is in Arkansas, and is therefore a citizen of Delaware and Arkansas. Accordingly, there is complete diversity of citizenship amongst the parties.

Plaintiff seeks damages of \$75,000 or more. Ex. B at p. 3.

This removal is being filed within thirty (30) days after receipt of the complaint by Walmart Stores, Inc. and Walmart, Inc. on August 10, 2020.

Based on the above, this court has removal jurisdiction over this action, and defendant Walmart, Inc. is entitled to remove this action to this Court from the District Court for the State of Alaska.

DATED this 27th day of August 2020, at Anchorage, Alaska.

RICHMOND & QUINN
Attorneys for Defendant
Walmart, Inc.

By: /s/ Kenneth M. Gutsch
Kenneth M. Gutsch
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CERTIFICATE OF SERVICE

I HEREBY certify that on the 27th day of August 2020
a copy of the foregoing was served by ECF on the
parties.

Adam Winner
Barber & Associates, LLC
540 E. 5th Ave.
Anchorage, AK 99501

/s/ Kenneth M. Gutsch
RICHMOND & QUINN
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